

Matthew W. Lampe (*pro hac vice* application pending)  
mwlampe@jonesday.com  
Wendy C. Butler (WB-2539)  
wbutler@jonesday.com  
Craig S. Friedman (CF-1988)  
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Matthew W. Ray (*pro hac vice* application pending)  
mwwray@jonesday.com  
JONES DAY  
2727 North Harwood Street  
Dallas, Texas 75201  
(214) 220-3939

Attorneys for Defendant  
International Business Machines Corporation

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MICHAEL DANIELI, on behalf of himself and  
those similarly situated,

Plaintiff,

v.

INTERNATIONAL BUSINESS MACHINES  
CORPORATION,

Defendant.

SCANNED

08 CV 3688 (RWS)

ECF CASE

MOTION TO ADMIT COUNSEL  
PRO HAC VICE

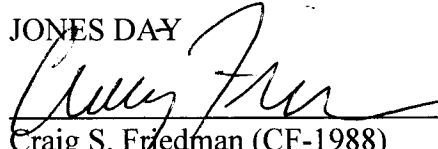
PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Craig S. Friedman, a member of good standing of the bar of this Court, hereby moves for an Order allowing the admission pro hac vice of

Matthew W. Ray  
Jones Day  
2727 North Harwood Street  
Dallas, Texas 75201  
(214) 220-3939  
mrray@jonesday.com

Matthew W. Ray is a member in good standing of the State Bar of Texas. There are no pending disciplinary proceedings against Matthew W. Ray in any State or Federal court.

Dated: June 5, 2008

JONES DAY

A handwritten signature in dark ink, appearing to read 'Craig S. Friedman', is written over a horizontal line.

Craig S. Friedman (CF-1988)  
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**08 CV 3688 (RWS)**

**ECF CASE**

**DECLARATION OF  
CRAIG S. FRIEDMAN  
IN SUPPORT OF MOTION TO  
ADMIT COUNSEL PRO HAC VICE**

CRAIG S. FRIEDMAN declares as follows:

1. I am an associate at Jones Day, counsel to Defendant International Business Machines Corporation. I am familiar with the proceedings in this case. I submit this declaration based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit Matthew W. Ray as counsel *pro hac vice* to represent Defendant in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on February 15, 2005. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Matthew W. Ray is a partner with Jones Day. I have found Mr. Ray to be a skilled attorney and a person of integrity. He was admitted to practice before the courts of the State of Texas on November 5, 1993. He has been and is a member in good standing of the aforementioned bar. Mr. Ray is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure. His Certificate of Good Standing from the State Bar of Texas is attached hereto as Exhibit A.

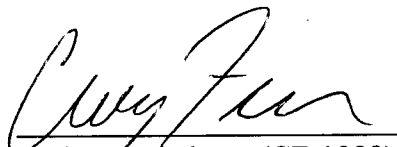
4. Accordingly, I am pleased to move the admission of Matthew W. Ray, *pro hac vice*.

5. Attached as Exhibit B is a proposed order granting this motion.

WHEREFORE, it is respectfully requested that the motion to admit Matthew W. Ray, *pro hac vice*, to represent Defendant in the above-caption matter, be granted.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 5th day of June, 2008.  
New York, New York

  
Craig S. Friedman (CF-1988)

# STATE BAR OF TEXAS



Office of the Chief Disciplinary Counsel

June 3, 2008

Re: Matthew W. Ray, State Bar Number 00788248

To Whom It May Concern:

This is to certify that Mr. Matthew W. Ray was licensed to practice law in Texas on November 5, 1993, and is an active member in good standing with the State Bar of Texas. "Good standing" means that the attorney is current on payment of Bar dues and attorney occupation tax; has met Minimum Continuing Legal Education requirements; and is not presently under either administrative or disciplinary suspension.

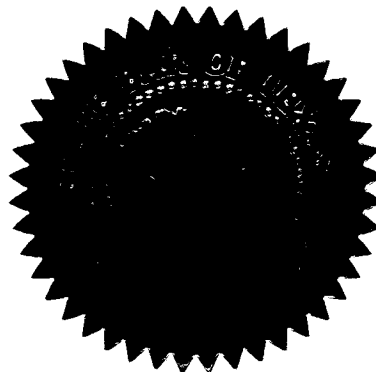
No previous disciplinary sanctions have been entered against Mr. Ray's law license.

Sincerely,

A handwritten signature in cursive script, appearing to read "John A. Neal".

John A. Neal  
Chief Disciplinary Counsel

JN/ss



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MICHAEL DANIELI, on behalf of himself and  
those similarly situated,

Plaintiff,

v.

INTERNATIONAL BUSINESS MACHINES  
CORPORATION,

Defendant.

**08 CV 3688 (RWS)**

**ORDER FOR ADMISSION  
PRO HAC VICE ON  
WRITTEN MOTION**

Upon the motion Craig S. Friedman, attorney for Defendant International Business  
Machines Corporation, and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED THAT**

Matthew W. Ray  
Jones Day  
2727 North Harwood Street  
Dallas, Texas 75201  
(214) 220-3939  
mwrap@jonesday.com

is admitted to practice *pro hac vice* as counsel for Defendant International Business Machines Corporation in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including Rules governing disciplining of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: June \_\_\_, 2008

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United States District Judge

**CERTIFICATE OF SERVICE**

I hereby certify that I have caused a true and correct copy of the foregoing MOTION TO ADMIT COUNSEL PRO HAC VICE to be served on the following counsel of record this 5th day of June, 2008 by forwarding a copy, by First Class mail, addressed to:

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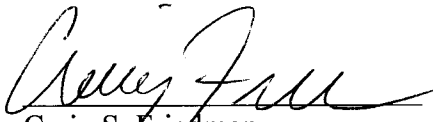
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Craig S. Friedman